

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
DIVISION

)	
)	CA
Plaintiff(s),)	
)	
v.)	
)	CONSENT AMENDED
)	SCHEDULING ORDER
)	
Defendant(s).)	

Pursuant to the Federal Rules of Civil Procedure and the Local Civil Rules of this Court, the following schedule is established for this case.

1. Motions to join other parties and amend the pleadings (Fed. R. Civ. P. 16(b)(1)) shall be filed no later than _____. **[FILL IN DATE - No less than 120 days before discovery deadline (¶ 5)]**
2. Plaintiff(s) shall file and serve a document identifying by full name, address, and telephone number each person whom Plaintiff(s) expects to call as an expert at trial and certifying that a written report prepared and signed by the expert including all information required by Fed. R. Civ. P. 26(a)(2)(B) has been disclosed to other parties by _____. **[FILL IN DATE - No less than 120 days before discovery deadline (¶ 5)]**
3. Defendant(s) shall file and serve a document identifying by full name, address, and telephone number each person whom Defendant(s) expects to call as an expert at trial and certifying that a written report prepared and signed by the expert including all information required by Fed. R. Civ. P. 26(a)(2)(B) has been disclosed to other parties by _____. **[FILL IN DATE - No less than 60 days before discovery deadline (¶ 5)]**
4. Counsel shall file and serve affidavits of records custodian witnesses proposed to be presented by affidavit at trial no later than _____. **[FILL IN DATE - No less than 60 days before discovery deadline (¶ 5)]** Objections to such affidavits must be made within fourteen (14) after the service of the disclosure. *See* Fed. R. Evid. 803(6), 902(11), or 902(12) and Local Civil Rule 16.02(D)(3).
5. Discovery shall be completed no later than _____. **[FILL IN DATE - The key date from which other dates are determined.]** All discovery requests shall be served in time for the responses thereto to be served by this date. De bene esse depositions must be completed by discovery deadline. **No motions relating to discovery shall be filed until counsel have consulted and attempted to resolve the matter as required by Local Civil Rule 7.02, and have had a telephone conference with Judge Currie in an attempt to resolve the matter informally.**

6. All motions, except those to complete discovery, those nonwaivable motions made pursuant to Fed. R. Civ. P. 12, and those relating to the admissibility of evidence at trial, shall be filed on or before _____. **[FILL IN DATE - Not more than 15 days after discovery deadline]**(Fed. R. Civ. P. 16(b)(2)).
7. Mediation, pursuant to Local Civil Rules 16.04 – 16.12, shall be completed in this case on or before _____. **[FILL IN DATE - Not more than 75 days after discovery deadline]** See Standing Order to Conduct Mediation 4:00-mc-5001, filed December 1, 2000, which sets forth mediation requirements (<http://www.scd.uscourts.gov>). At least thirty (30) days prior to this mediation deadline, counsel for each party shall file and serve a statement certifying that counsel has: (1) provided the party with a copy of Standing Order 4:00-mc-5001; (2) discussed the availability of mediation with the party; and (3) discussed the advisability and timing of mediation with opposing counsel.
8. No later than _____ **[FILL IN DATE - Not more than 90 days after discovery deadline]** the parties shall file and exchange Fed. R. Civ. P. 26(a)(3) pretrial disclosures. Within fourteen (14) days thereafter, a party shall file and exchange Fed. R. Civ. P. 26(a)(3) objections, any objections to use of a deposition designated by another party and any deposition counter-designations under Fed. R. Civ. P. 32(a)(4). See Local Civil Rule 30.03(J) (video deposition additional requirements).
9. Motions in limine must be filed by _____. **[FILL IN DATE - Not more than 99 days after discovery deadline]**
10. Parties shall furnish the Court pretrial briefs five (5) business days prior to the date set for jury selection (Local Civil Rule 26.05).¹ Attorneys shall meet at least five (5) business days prior to the date set for submission of pretrial briefs for the purpose of exchanging and marking all exhibits. See Local Civil Rule 26.07.
11. This case is subject to being called for jury selection and trial on or after _____. **[FILL IN DATE - 120 days after discovery deadline]**

The parties' attention is directed to the *Notice of Availability of United States Magistrate Judge to Exercise Jurisdiction*. A copy of the form is available in the Clerk's office or at the Court's internet site at <http://www.scd.uscourts.gov> under Judge Currie's forms.

[Judge Currie's staff will add her signature block after receipt of the proposed order]

¹Judge Currie requires that pretrial briefs be filed with the Clerk of Court as part of the public record and served on opposing parties.